

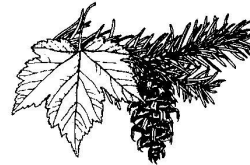
Maiden Wind Farm

Telephone comment by Ginny Kuehn
5/15/02

(NO Name)
Registered Voter
Used to work for the Corps of Engineers

I want to vote against the power generators on Rattlesnake Mountain. I don't think we need them right now. I think it should be carefully studied to make sure it doesn't involve bird migratory patterns and I think some visual pollution needs to be done. The project sneaked upon us.

RECEIVED BY BPA PUBLIC INVOLVEMENT LOG#: MWDEIS-012 RECEIPT DATE: MAY 15 2002



Washington Native Plant Society
Appreciate, Conserve, and Study Our Native Flora

7400 Sand Point Way NE, Seattle, Washington 98115
(206) 527-3210

May 14, 2002

Sarah T. Branum
Environmental Specialist – KEC-4
Bonneville Power Administration
PO Box 3621
Portland, OR 97208-3621
stbranum@bpa.gov

RECEIVED BY BPA PUBLIC INVOLVEMENT LOG#: MWDEIS-013 RECEIPT DATE: MAY 15 2002

Mike Shuttleworth
Benton County Planning and Building Dept
1002 Dudley Avenue
Prosser, WA 99350
mike_shuttleworth@co.benton.wa.us

Dear Ms. Branum and Mr. Shuttleworth:

Thank you for considering the following comments regarding the Draft NEPA/SEPA EIS for the Maiden Wind Farm (Benton County, WA; March 2002). We have limited our comments to two major issues.

There appears to be an inconsistency in the number of acres that will be impacted by the project and require mitigation. The amount of 'priority shrub-steppe habitat' permanently and 'temporarily' displaced are 57.5 and 174.4 acres, respectively.¹ These acreages do not include the damages to the vegetation type referred to in the document as 'grassland-steppe,' which would double the amount of land requiring mitigation (adding 57.2 acres permanently displaced and 187.0 acres temporary disturbed²). The grassland-steppe acreages are included in the following section of the same table, but the reader is referred back to the vegetation section for specific mitigation measures. It therefore appears that damage to grassland-steppe is not being considered for mitigation.

Damages to both 'shrub-steppe' and 'grassland-steppe' types should be mitigated. To quote from the document's description of grassland-steppe, it 'provides cover, breeding habitat, and forage for a variety of bird and wildlife species,' and 'like the shrub-steppe, the grassland-steppe is subject to grazing, with habitat quality varying from poor to good.'³ While the Draft EIS states that much of the area identified as grassland-steppe is dominated by non-native cheatgrass and bulbous bluegrass, it also states that varying amounts of native grasses and forbs also occur, and that scattered sagebrush patches may be present. The document does not

¹ Table S-1 'Potential Impacts and Mitigation of the Proposed Maiden Wind Farm', Section 2. Vegetation.

² Table 3.3-3, page 3-23.

³ Page 3-15. Also see Table 3.3-1, page 3-14.

contain an assessment of the amount of grassland-steppe in good and poor quality, nor is the condition mapped or described spatially.

While we have not been to the project site, our considerable experience in the region suggests that the low cover of sagebrush species in the area mapped as grassland is probably because it burned more recently than adjacent areas that were mapped as shrub-steppe. If that is the case, the distinction between shrub-steppe and grassland-steppe (with patches of sagebrush) may hold little meaning. That is, the distinction may not necessarily point to differences in quality or diversity of habitat in the long-term, although it is convenient to map areas with shrub separately from areas without because it is a feature visible on an aerial photo. Some of the better quality habitat in the area may in fact be in the steeper areas, particularly areas that have Idaho fescue. The presence of cheatgrass, even its dominance, and the lack of shrubs should not automatically dismiss the vegetation type from an area's importance on a landscape scale. Please review this matter carefully. Rex Crawford, ecologist with the Washington Natural Heritage Program, may be able to assist in clarifying this issue.

The second major problem we have with the Draft EIS is the inadequacy of the proposed mitigation measures for disturbances to native habitat. As proposed, there is the potential for net loss of habitat, with protection afforded to the mitigated sites only for 'the life of the project.' It is not acceptable that mitigation for damage to steppe habitat, particularly on publicly owned land, be only temporary. If it is completely unavoidable, habitat destruction or degradation on public land should be mitigated with acquisition of permanently protected land. We suggest that funds gained for mitigating project disturbances be at least partially channeled to the Trust Land Transfer Program (DNR), or other such program, for the permanent protection of habitat on publicly owned land.

Finally, we suggest that heavy fines be imposed for disturbance to sites flagged as sensitive, such as for rare plants, habitat, wetlands, etc. during construction activities. Driving machinery and being involved with construction makes it difficult many operators, working in a different scale and time frame, to have a balanced appreciation of the habitat they are impacting. Levying fines may make it easier for operators to pay close attention to the impact of their actions.

Please feel free to contact us with any questions or if we can clarify our comments.

Thank you,

Debra Salstrom and Richard Easterly
Conservation Committee
Washington Native Plant Society

Kuehn, Ginny -KC-7

From: Pam Hedges [pamhedges@charter.net]
Sent: Wednesday, May 15, 2002 9:43 PM
To: comment@bpa.gov
Subject: Wind

RECEIVED BY BPA PUBLIC INVOLVEMENT LOG#: MWDEIS-014 RECEIPT DATE: MAY 16 2002

Please do not build wind mills on Rattlesnake. I have admired Rattlesnake for the nine years we have lived here. I do not want that profile distorted by an unnecessary project, especially one that will have to use public funds in order to be built.

Sincerely,
Pam Hedges
509-946-8692

5/16/02